

NPDES General Permit #1 Presentation

Introduction

Joe Griffin (Storm Water Coordinator) and Dave Perry (ESS)

Informal presentation – Ask questions as we go, however, there likely will be time also at the end.

History of Storm Water Program

1972 Amendments to Water Pollution Control Act (aka Clean Water Act) prohibits discharge of pollutants from point source to navigable water, unless authorized by NPDES permit.

Sewage Treatment Plants and Industrial process waste discharges were easily identifiable and controlled but soon after it became evident that there were more diffused sources degrading our water including Agriculture / Urban storm water.

1987 Another amendment to Clean Water Act 'Municipal and Industrial Storm Water Discharges. Includes two phase approach to addressing storm water discharges.

Identified three distinct types of regulated entities:

Industrial
Construction
MS-4's

This presentation is focused on Industrial NPDES Permits #1

Individual Permits

Existing facilities make application by October 1, 1993

New facilities make application within 180 days prior to commencement

General Permits

Within 90-days prior to commencement of discharge.

Storm Water Discharges Associated with Industrial Activity (Not including Construction)

Eleven categories of facilities which EPA defines using combination of Standard Industrial Codes and facility activities.

Definition: 'Storm water discharges associated with industrial activity' (taken from the NPDES Regulations) - 40 CFR 122.26(b) (14).

The discharge from any one conveyance which is used for collecting and conveying storm water and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.

Includes but not limited to: Industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility, material handling sites, refuse sites, sites used to apply or dispose of process wastewaters, sites used for storage, maintenance of material, sites used for residual raw material storage, treatment, storage or disposal, shipping and receiving areas, manufacturing buildings, storage areas (incl. tank farms) for raw materials and intermediate and finished products.

First Question to ask yourself: Does your facility perform any industrial activity subject to the storm water permitting requirements?

Facility's Primary SIC Code (may wish to use receipts and revenues as guide otherwise, what employs the most people). Secondary SIC codes do not count.

One suggested web site for SIC Codes: <http://ehso.com/siccodes.php>

Different for industrial sectors covered narratively rather than strictly by SIC Code.

Exemptions: Oil and Gas exploration, mining operations

You make the determination of whether you are regulated: First Develop a pollution prevention plan.

Pollution Prevention Plan (**Summary Guidance Handout**)

Major Components of the Plan

Identify pollution prevention

Preparing a site map

Describing the potential pollutants present at the facility

Describing activity at the yard that reduces pollutant runoff

Conducting a site evaluation for regulatory compliance.

Exclusions: Have the opportunity to certify to a condition of 'no exposure', if their industrial materials and operation activities are not exposed to storm water.

Discontinuance of Permit Coverage A facility operator must complete and submit to the appropriate NPDES Permitting authority a 'Notice of Termination' form.

[EPA has assigned responsibility of the NPDES Program to the IDNR](#)

DNR Mission: To conserve and enhance our natural resources in cooperation with individuals and organizations to improve the quality of life in Iowa and ensure a legacy for future generations.

Environmental Services Division

Water Quality Bureau (Issue Storm Water Permits)

Joe Griffin (Coordinator)

Deb Schiel Larson

Field Services & Compliance Bureau

Six Field Offices

Role of DNR

Issuance of permits, inspections and work/coach regulated public to achieve compliance.

Enforcement is last resort

Inspections

Nature & Frequency

Routine (A minimum of once during permitting cycle)
Another Program Area
Complaint
Spill

Content of Inspections

What do we look for in our inspections

Common Deficiencies Identified

Out dated Pollution Prevention Plan
Self-Monitoring exceedances
Housekeeping
Maintenance of Controls
Annual Inspection documentation

What to expect following an inspection by DNR

Verbal explanation of your compliance status
Written inspection report (may be in the form of a letter)
If Non Compliant: You/your company will likely receive a NOV / Notice of Non-compliance

Enforcement (should never be a surprise)

Consent / Administrative Order (w/penalty)
Referral to Attorney General
Referral to EPA

How to Avoid Problems w/DNR

Hire a storm water professional
Compile a quality PPP & Update as necessary
Implement your PPP
Perform any required monitoring

- Conduct Required inspections & keep records
- Re-Evaluate Effectiveness of controls and address maintenance issues
- Effective communication
- Networking

Looking Ahead for the program

- Depends upon public perception
- More Stakeholder involvement
- SEP's as part of enforcement settlement

Supporting Photographs